

**HEARING STATEMENT
RESPONSE TO
INSPECTOR'S
MATTERS, ISSUES AND
QUESTIONS
MATTER 4 (MEETING
HOUSING NEEDS)**

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1.0 Introduction

1.1 Background

This Hearing Statement has been prepared by Bidwells on behalf of Emmanuel College, Cambridge in respect of Matter 4 (Meeting Housing Needs) of the Dover Local Plan Examination in Public.

This Statement makes representations to the following issues:

- Issue 1: Total Supply
- Issue 2: Five Year Housing Land Supply

Representations were made to the 'Regulation 19' Local Plan.

2.0 Responses to Matters, Issues and Questions

2.1 Matter 4, Issue 1: Total Supply

Question 3: Is the projected supply of housing justified and has sufficient land been identified to ensure that housing needs will be met, including an appropriate buffer to allow for changing circumstances on development sites?

There is considerable reliance in the submission Plan on strategic and larger sites to deliver housing needs in the district across the Plan period. This includes a particular emphasis on delivering dwellings at the Whitfield Urban Expansion (Policy SAP1). Given the uncertainty over delivery of such a large site we do not consider that this is sufficient to meet housing requirements in the district across the Plan period. Whilst there may be sufficient land in theory, the uncertainty surrounding delivery of strategic sites means that the Council should revisit its development strategy to ensure that dwellings can be delivered at smaller sites at other settlements in the district. This would include appropriate allocations at Local Centres and Rural Service Centres, in particular, which have sufficient facilities, services and infrastructure to accommodate additional dwellings and where smaller sites could support delivery of dwellings in the medium term, before strategic or larger allocations begin to deliver.

We note the 'Made' Ash Neighbourhood Plan which covers the period up to 2037. The Local Plan covers the period up to 2040 and explicitly leaves the allocation of housing growth and sites to the Ash Neighbourhood Plan. There is therefore a time gap that isn't met by either Plan. Notwithstanding the need to assess other sites in the district which would make up for delivery issues associated with larger allocations, we consider that development in Ash could come forward later in the Plan period thereby bridging the gap between the two plans. Any policy pertaining to delivery of sites in Ash could give an approximate trigger year or could come forward for development if there is a projected shortfall in housing delivery in the district. This would add sufficient flexibility to delivery across the Plan period and would seek to bolster and maintain housing delivery.

Much of the land adjacent to the settlement boundary of Ash is owned by Emmanuel College, which has a track record of delivering dwellings in the village. The 'Made' Ash Neighbourhood Plan allocates two sites for residential development which are/were within ownership of the College. The first is nearing completion (Land west of Chequer Lane for approximately 90 dwellings). The second (Allocation ANP7d (Land north of Molland Lane) for approximately 105 dwellings) is subject to pre-application enquiry with a planning application due to be submitted by the College in Spring 2024. The settlement has a consistent history of delivering residential development and given the size of small allocations is capable of delivering dwellings more effectively. We advocate a re-appropriation of dwellings across the district in such settlements where they will be delivered promptly and within five years, thereby bolstering and maintaining the Council's housing land supply.

Appendix Di of the submission Plan records the Ash Neighbourhood Plan allocated sites as delivering dwellings from Year 5 (2026-2027) and then at only modest growth to Year 8 (2029-2030). Given the status of the allocations and progress of planning applications, we consider that delivery should be recorded sooner and at a greater number per year.

2.2 Matter 4, Issue 2: Five Year Housing Land Supply

Question 3: What evidence has the Council used to determine which sites will come forward for development and when? Is it robust?

Undue reliance is being placed on allocation SAP1 to deliver sufficient dwellings across the Plan period. This large allocation appears to have fallen behind with delivery with the figures outlined in the Masterplan SPD (2011) projected downwards in the submission Local Plan. The Annual Monitoring Report identifies issues over deliverability in the projected timescales and given issues of a volatile market and viability, we do not consider that reliance on the large sites to deliver and maintain dwellings across the Plan period, is well-evidenced or justified.

The Council's development strategy does not spread development across appropriate settlements in the district which could accommodate a relatively modest number of dwellings and which could bolster delivery and supply in the district.

Appendix Di of the submission Plan identifies delivery of the extant Whitfield Urban Extension site permissions as delivering a modest number of dwellings up to Year 10 (2031-2032). There is no evidence to back up these projections and whilst they may be realistic, their modest delivery may not bolster or sustain the Council's housing land supply.

Question 4: Where sites have been identified in the Plan, but do not yet have planning permission, is there clear evidence that housing completions will begin within five years as required by the Framework?

There does not appear to be sufficient evidence that site allocations could be delivered within five years. Almost 50%v of new dwellings are projected to be delivered in Dover or by the Whitfield Urban Extension and this development is not subject to a planning application which permits a sufficient quantity of development or which guarantees completion of dwellings within five year. Delivery by these urban extensions is key to realising the development strategy of the Plan. The Annual Monitoring Report (2021-2022) casts doubt on deliverability of dwellings at Whitfield Urban Extension and this admittance by the Council should be read as a warning that projected rates of deliverability are not realistic or justified and that they could not reasonably be subject to planning permission which would ensure deliverability within five years.

Appendix Di of the submission Plan identifies that the Whitfield urban Extension would start delivering dwellings in Year 4 (2025-2026) of the Plan, increasing to 100 and 150 in years 6 and 7, respectively. Given the uncertain situation over the status of permissions for the site and that the trajectory scarcely records any delivery in the first five years of the Plan period, we would suggest that deliverability is assessed in some detail. This is important as, if this site fails to deliver, then it undermines the development strategy for the Plan which may render it unsound.

Question 6: Having regard to the questions above, will there be a five-year supply of deliverable housing sites on adoption of the Plan?

The Emerging Plan is relying on larger site allocations to deliver sufficient dwellings across the Plan period. Sufficient evidence has not been submitted to demonstrate that the delivery projections are accurate and that matters such as viability, deliverability and delivery of infrastructure 'enabling' projects will not unduly impact on delivery. We consider that, given these significant variables, the Council is jeopardising its housing land supply and given the development strategy for the district, will be unable to deliver dwellings in appropriate smaller settlements where the quantum of development could be delivered in a much-reduced timeframe, thereby bolstering and maintain delivery and supply.

Question 7: What flexibility does the Plan provide if some of the larger sites, such as the Whitfield Urban Extension, do not come forward in the timescales envisaged?

Given the size of the Whitfield Urban Extension and the Council's reliance on it, to deliver a significant number of dwellings across the Plan period, we believe it is important for the Council

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to fully justify the assumptions regarding deliverability of this site and whether they are reasonable and accurate. The Council's Annual Monitoring Report concedes that the overall timetable for delivery of the Extension is behind schedule in the Core Strategy and whilst deliverability has been addressed in the submission Local Plan, we do not consider these figures are reliable, particularly given the reliance the Council's placing on this allocation to deliver dwellings across the Plan period.

There is little apparent flexibility or contingency in the Whitfield urban Extension and other larger sites to address where housing shortfall may be delivered in the district, if deliverability falters and are not delivered as envisaged. This not only creates a housing delivery shortfall over a five year period but it also has ramifications for the development strategy for the Plan and whether it could reasonably be found sound.

Given the over-reliance on Whitfield Urban Extension in particular, we consider that the Council should consider allocations on smaller sites in higher order settlements. The onus on delivering dwellings on smaller sites will mean that housing supply can be bolstered if the larger allocations fail to deliver in a timely fashion.



BIDWELLS